

EXHIBIT 141

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Civil Action No. 4:20-CV-957-SDJ

THE STATE OF TEXAS, et al.,
Plaintiffs,
vs.
GOOGLE LLC,
Defendant.

DEPOSITION OF: JONATHAN E. FARMER

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The videotaped deposition of Jonathan E. Farmer was taken before Janine N. Leroux, Stenographic Court Reporter and Notary Public in and for the State of Kentucky at 310 Whittington Parkway, Suite 101, Louisville, Kentucky commencing on April 25, 2024, at the approximate hour of 9:03 a.m. Said deposition was taken pursuant to Federal Rules of Civil Procedure 30(b)(6).

Job No. CS6654591

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1 Q. So my review of the document suggests
2 that the consumer is complaining about a listing
3 on Google My Business. Do you agree?

4 A. Yes.

5 Q. So based on your review of the consumer
6 complaints in Kentucky's document productions
7 before today, did you see any complaints that had
8 anything to do with Google Ad Tech?

9 A. Based upon my review, we saw numerous
10 complaints against Google. None of them
11 specifically stated "Google Ad Tech." It is
12 possible that some of the underlying issues in
13 those complaints could touch on Google Ad Tech.
14 But consumers, you know, file a complaint. They
15 may not fully understand exactly what they're
16 complaining about or how that works.

17 Q. Sure.

18 A. But --

19 Q. Fair to say that Kentucky took an
20 understandably broad approach to collecting
21 potentially responsive consumer complaints?

22 A. Yes. Kentucky collected a broad
23 collection of consumer complaints and produced
24 them in this case.

25 Q. Understandably. So -- and accepting

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1 you -- is it your position that the Rule 45
2 subpoena responses show harm?

3 MR. HELERINGER: Objection, form.

4 A. I don't remember what they show. I'm
5 not excluding that as a possibility.

6 Q. I'm not asking you to speculate about
7 what documents show. I'm asking if you have seen
8 documents from entities in Kentucky showing that
9 they were harmed by Google's conduct.

10 A. Like I say, I've seen national -- I've
11 seen documents -- sorry.

12 There are documents produced in
13 discovery that show national harm, and national
14 harm would obviously include Kentucky. There is
15 no reason that Kentucky somehow wouldn't be
16 applicable to an ad program that Google runs
17 worldwide.

18 Q. You're ignoring the portion of my
19 question that asks about entities in Kentucky.
20 I'm asking about entities in Kentucky that have
21 produced documents showing that they were harmed.

22 A. Maybe I'm hung up on what -- what is an
23 entity in Kentucky.

24 Q. An in-state advertiser, an in-state
25 publisher, an individual consumer in Kentucky.

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1 A. Lots of entities have, you know,
2 nationwide footprints.

3 Q. Have any nationwide entities with a
4 footprint in Kentucky produced documents showing
5 that they were harmed?

6 A. To the extent they did, they would be
7 in the document productions that we've already
8 produced.

9 Q. Right. But I'm asking if within the
10 document productions you're referencing, are there
11 any documents produced by entities with a
12 footprint in Kentucky that show they were harmed?

13 A. So in that instance, I'd refer you back
14 to Mr. Gordon because he testifies on behalf of
15 all common facts on behalf of Kentucky.

16 Q. So my understanding was --

17 A. I didn't read all of the document
18 productions produced by Google produced at the
19 beginning of this case in preparation of this
20 deposition.

21 Q. My understanding was Mr. Gordon was not
22 going to be talking about harm specifically to
23 Kentucky. Did you have a different understanding
24 about Mr. Gordon's testimony?

25 A. No.

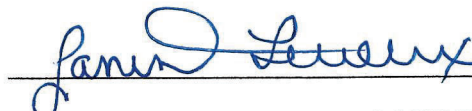
STATE OF KENTUCKY)
COUNTY OF MONTGOMERY)

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I, JANINE N. LEROUX, Court Reporter, the undersigned Notary Public in and for the State of Kentucky at Large, certify that the facts stated in the caption hereto are true; that at the time and place stated in said caption, the witness named in the caption hereto personally appeared before me, and that after being by me duly sworn, was examined by counsel for the parties; that said testimony was taken by me in stenotype and later reduced to computer-aided transcription, and the foregoing is a true record of the testimony given by said witness.

No party to said action nor counsel for said parties requested in writing that said deposition be signed by the testifying witness.

My commission expires: January 21, 2024.



JANINE LEROUX - COURT REPORTER
NOTARY PUBLIC - SPECIAL COMMISSION
STATE-AT-LARGE

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ERRATA SHEET FOR THE TRANSCRIPT OF JONATHAN FARMER

Case Name: *The State of Texas, et. al. v. Google, LLC*, No. 4:20-CV-957-SDJ

Deposition Date: April 24, 2024

Deponent: Jonathan Farmer

Page	Line	Corrections	Reason for Correction
11	11	The words "and identified" should be "did identify"	Transcription error
19	16-17	The sentence "I'm not sure that I would agree. We could bring it in State Court." should read "I'm not sure that I would agree we could bring it in State court."	Transcription error
36	20	The word "KCP" should read "KCPA"	Transcription error
93	24	The number "1.707,588" should be "1,707,588"	Transcription error
154	3	The word "mediary" should be "intermediary."	Transcription error
184	17	The words "I require the Attorney General" should read "require the Attorney General"	Transcription error
198	3	The word "It's" should be "It stands"	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: 5-23-24

Signature: Jonathan Farmer